

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

CRESHEVA DAVIS,

Plaintiff,

v.

REGIONS BANK,

Defendant.

**Case No.
2:06cv00264-MHT**

REPORT OF PARTIES' PLANNING MEETING

Pursuant to Federal Rule of Civil Procedure 26(f) and the Court's Order dated April 21, 2006, a meeting was held on April 24, 2006 and was attended by:

Jerry D. Roberson on behalf of Plaintiff Cresheva Davis; and

Charles B. Paterson and Kelly F. Pate on behalf of Defendant Regions Bank.

- 1. Pre-Discovery Disclosures.** The parties will exchange the information required by Federal Rule of Civil Procedure 26(a)(1) on or before June 1, 2006.
- 2. Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

Plaintiff expects to conduct discovery necessary to support the plaintiff's claims and damages.

Defendant expects to conduct discovery regarding the facts and circumstances serving as the basis of the Plaintiff's claims, including but not limited to plaintiff's job performance; the alleged discrimination; the alleged violation of the Employee Retirement Income Security Act of 1974; the alleged damages; the anticipated testimony of plaintiff's witnesses; issues that arise during the course of discovery and/or that are raised in any dispositive motion of the plaintiff or response of the plaintiff to any dispositive motion filed by the defendant; and such other material issues that may become relevant as the case develops.

3. Discovery Limitations and Cutoffs. The parties agree:

- a. All discovery shall be commenced in time to be completed by March 30, 2007.
- b. Maximum of 40 interrogatories by each party to each party. Responses due 30 days after service.
- c. Maximum of 40 requests for admission by each party to each party. Responses due 30 days after service.
- d. Maximum of 40 requests for production of document by each party to each party. Responses due 30 days after service.
- e. Maximum of 10 depositions by Plaintiff to Defendant and 10 by Defendant to Plaintiff. Depositions limited to eight hours.
- f. Reports from retained experts under Rule 26(a)(2) due:

from Plaintiff by October 1, 2006; and
from Defendant by October 30, 2006.
- g. Supplementation under Rule 26(e) due reasonably upon knowledge of additional information, but not later than 14 days before the close of discovery.

4. Other Items.

- a. The parties do not request a conference with the Court before entry of the scheduling order.
- b. The parties request a final pretrial conference on or before June 1, 2007
- c. Plaintiff should be allowed until June 20, 2006 to join additional parties and to amend the pleadings.
- d. Defendant should be allowed until June 30, 2006 to join additional parties and to amend the pleadings.
- e. All potentially dispositive motions should be filed on or before March 1, 2007
- f. Settlement cannot be realistically evaluated prior to the completion of preliminary discovery.
- g. Final lists of trial evidence under Rule 26(a)(3), both witnesses and exhibits, and any motions in limine should be due from the parties on or before June 1, 2007
- h. Parties should have 14 days after service of final lists of trial evidence and motions in limine to list objections under Rule 26(a)(3) or respond.

- i. The case should be ready for trial by this Court's July 23, 2007 trial term. At this time the parties believe the trial is expected to take approximately 3 days, excluding jury selection.

Respectfully submitted this 25th day of April, 2006.

/s/ Jerry Roberson

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